

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Joint Administration Pending)

Ref. Nos. 22, 23 & 29

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, proposed counsel to the above captioned debtors and debtors-in-possession (the “Debtors”) hereby certify as follows to the best of my knowledge, information and belief:

1. On November 17, 2022, the Debtors filed the *Emergency Motion Pursuant to Fed. R. Bankr. P. 1014(B) (I) to Transfer Chapter 15 Proceeding Relating to FTX Digital Markets Ltd. and (II) for a Stay* [D.I. 22] (the “Motion to Transfer”).

2. Contemporaneously therewith, the Debtors filed the *Motion for Entry of an Order Shortening Time for Notice of Emergency Motion Pursuant to Fed R. Bankr. P. 1014(B) (I) to Transfer Chapter 15 Proceeding Relating to FTX Digital Markets Ltd. and (II) for a Stay* [D.I. 23] (the “Motion to Shorten”).

3. On November 17, 2022, the Court entered the *Order Granting Motion to Shorten Time for Notice of Emergency Motion Pursuant to Fed R. Bankr. P. 1014(B) (I) to Transfer Chapter 15 Proceeding Relating to FTX Digital Markets Ltd. and (II) for a Stay* [D.I. 29] (the “Order”) granting the Motion to Shorten and scheduling a hearing on the Motion to Transfer for November 21, 2022 at 10:00 a.m. (ET).

¹ The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

4. With the permission of the Court, the hearing on the Motion to Transfer has been rescheduled to November 22, 2022 at 11:00 a.m. (ET) (the “Rescheduled Hearing Date”). An amended order reflecting the Rescheduled Hearing Date is attached hereto as Exhibit A (the “Amended Order”). A copy of the proposed Amended Order compared against the Order is attached hereto as Exhibit B.

5. Accordingly, the Debtors respectfully request that the Court enter the proposed Amended Order at its earliest convenience.

Dated: November 17, 2022
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Kimberly A. Brown

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

*Proposed Counsel for the Debtors
and Debtors-in-Possession*